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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20544

In re Petition of )  
 )  
BENEDICT COMMUNICATIONS, INC. )  
 )  
For Amendment of §73.202 (b) )  
Table of FM Allotments )  
to Add Channel 251C3 at )  
Hamilton, Montana )

RM- \_\_\_\_\_

MM Docket No. \_\_\_\_\_

To: Chief, Allocations Branch,  
Policy and Rules Division, Mass Media Bureau

PETITION FOR RULEMAKING

Benedict Communications, Inc, ("Benedict")<sup>1</sup>, by its attorneys and pursuant to Section 1.401 of the Commission's Rules, hereby petitions for rulemaking to amend the Commission's Table of FM Allotments (Section 73.202(b) of the Rules) to add Channel 251C3 (98.1 MHz) at Hamilton, Montana. The proposed reference coordinates are: 46-14-42 North; 114-09-36 West.

As detailed in the attached engineering analysis, prepared by Glenn Clark & Associates, Channel 251C3 may be allocated consistent with the FCC's spacing requirements as provided in Section 73.207 of the Rules. Additionally, the reference coordinates are within the city limits, ensuring full compliance with Section 73.315(a) and (b), without necessitating any site restriction for the allotment of this channel.

<sup>1</sup> Benedict also is the licensee of KLYQ(AM) and KBMG(FM), Hamilton, Montana.

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If the Commission assigns Channel 251C3 to Hamilton, Montana, Benedict has authorized the undersigned to state that it intends to submit an application for authority to construct and operate the new station. If this application is successful, Benedict intends promptly to construct the facility.

On the basis of the foregoing, Benedict respectfully requests the Commission to amend the Table of FM Allotments by adding Channel 251C3 to Hamilton, Montana.

Respectfully submitted,

BENEDICT COMMUNICATIONS, INC.

By:



James R. Bayes  
Jerry V. Haines

of

WILEY, REIN & FIELDING  
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Washington, DC 20006  
(202) 429-7000

Its Attorneys

September 13, 1994

**ENGINEERING REPORT**

**IN SUPPORT OF**

**PETITION FOR RULEMAKING**

**TO ALLOCATE CHANNEL 251C3 (98.1 MHz)  
TO HAMILTON, MONTANA**

**BENEDICT COMMUNICATIONS, INC.**

**SEPTEMBER 1994**

**GLEN CLARK & ASSOCIATES  
GREENVILLE, PA**

### ENGINEERING STATEMENT

The following materials were prepared on behalf of Benedict Communications, Inc. ("BENEDICT"), licensee of KLYQ(AM) and KBMG(FM), both licensed to Hamilton, Montana.

Benedict proposes herein to allocate Channel 251C3 (98.1 MHz) to Hamilton, Montana. The following reference coordinates are proposed:

46-14-42 North  
114-09-36 West

Expressed in standard form, the instant proposal would change the Commission's Table of Allotments in the following way:

<u>CITY OF LICENSE</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Hamilton	240C3	240C3, 251C3

The attached Exhibit 1 is a tabulation showing required spacings of interest. Exhibit 2 is a map showing the location of the reference coordinates and their position relative to the city limits of the proposed City of License. The reference coordinates are within the city limits, insuring that full compliance with Part 73.315(a) and (b) can be achieved and negating the need for any site restriction for the allotment of this channel.

These materials were prepared by me or under my direction and are true and correct to the best of my knowledge and belief.



Glen Clark, P.E.  
Georgia Registration #18713

September 1, 1994

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 \* PROGRAM FMSRCH \*  
 \* COPYRIGHT 1986 AND 1991 BY GLEN CLARK \*  
 \* VERSION 1.5 - 31 MAY 1992 \*  
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STUDY NAME - HAMILTON MONTANA

SEARCHED FROM CHANNEL 251 TO CHANNEL 251.  
 CLASS OF CHANNEL STUDY: C3  
 THE BUFFER DISTANCE IS - 100.00 KM.  
 CLASS D STATIONS NOT INCLUDED IN PRINTOUT.

REFERENCE CO-ORDINATES: 46 14 42 North Latitude  
 114 9 36 West Longitude

CITY/STATE/COUNTRY	CALL	POWER	HEIGHT	TD2	STATUS	CHANNEL	BUFFER	REQ	DIST	AZIMUTH	LATITUDE	LONGITUDE	FILE #
CHANNEL 251													
Spokane	WA US	KISC	94.00	619	NNN FM LIC	251C	44.4	237.0	281.36	303.1	47 34 53	117 17 47	BLH6883
Spokane	WA US		0.00	0	NNN FA USED	251C	44.4	237.0	281.36	303.1	47 34 53	117 17 47	
Anaconda	MT US		0.00	0	NNN FA VACANT	249C3	51.8	43.0	94.80	99.2	46 6 7	112 56 59	
Anaconda	MT US	KGLMFM	0.21	287	NNN FM LIC	249A	52.8	42.0	94.80	99.2	46 6 7	112 56 59	BLH6094
Dillon	MT US		0.00	0	NNN FA USED	252C3	62.2	99.0	161.19	133.5	45 14 22	112 40 3	
Dillon	MT US	KDBMFM	10.50	151	NNN FM LIC	252C3	62.2	99.0	161.19	133.5	45 14 22	112 40 3	BLH930625KB

STUDY COMPLETE.  
 6 RECORDS PRINTED.

# EXHIBIT 1

## TABULATION OF ALLOCATION SITUATION

BENEDICT COMMUNICATIONS, INC.  
 PROPOSED CH251C3 (98.1 MHz)  
 HAMILTON, MONTANA

SEPTEMBER 1994

GLEN CLARK & ASSOCIATES  
 GREENVILLE, PA

